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8 DANIEL ORTEGA

9  
10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**  
12 (Honorable Judge Bernard G. Skomal)

13 UNITED STATES OF AMERICA, }  
14 Plaintiff, }

15 v. }

16 DANIEL ORTEGA (23), et al., }  
17 Defendant. }

Case No.: 15CR2310-WQH

JOINT MOTION TO MODIFY  
CONDITIONS OF PRE-TRIAL  
RELEASE

18 Mr. ORTEGA seeks a modification of pre-trial release conditions to  
19 allow him to travel to Costa Rica area on a family vacation on Friday,  
20 August 12, 2016 through Wednesday, August 17, 2016, inclusive.

21 Mr. ORTEGA also requests the Court authorize Pretrial Services to  
22 release his United States passport to him in order to permit him to travel to  
23 Costa Rica during the dates requested above. Mr. ORTEGA agrees to  
24 return his passport to Pretrial Services forthwith upon his return.

25 There is no opposition from Pretrial Services Officers Shakira Davis  
26 and Cynthia Miramontes, nor Assistant U.S. Attorney Benjamin Katz.

27 On February 2, 2016, this Court set conditions for Mr. ORTEGA's  
28 pre-trial release, including a condition restricting Mr. ORTEGA's travel to  
the State of California. On February 9, 2016, Mr. ORTEGA posted his own  
bond.

1 DATED: July 21, 2016

/s/ Michael L. Crowley  
Michael L. Crowley  
Attorney for Defendant #23  
DANIEL ORTEGA

4 DATED: July 21, 2016

Daniel Ortega  
Defendant #23

7 DATED: July 21, 2016

/s/ Benjamin Katz  
Benjamin Katz  
Assistant U.S. Attorney  
Attorney for Plaintiff

11 DATED: July 21, 2016

/s/ Cynthia Miramontes  
Cynthia Miramontes  
U.S. Pretrial Services Officer